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Sahara Investments LLC, Las Vegas Economic
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JINGLING WU, an individual; WANLING LI, an individual; HONGHONG JIANG, an individual; RONG WANG, an individual; BIYU XIE, an individual; SHAOZHEN YAN, an individual; ZHIRONG FU, an individual; GUANGJU YAN, an individual; QILONG LIAO, an individual; YING ZHU, an individual; QING LI, an individual; ZIXUN YANG, an individual; QU CHEN, an individual; YANXIN ZHOU, an individual; XIAOPING HAN, an individual; KAI ZHOU, an individual; YIXI LIU, an individual; XIAOYING HUANG, an individual; YIHUI LIANG, an individual; KAIQING YANG, an individual; XIANNA CHEN, an individual; ZHIYAN ZHANG, an individual; JINYUN YE, an individual; YIRUI CHEN, an individual; WENJIAN LIAO, an individual; YIRANG LIU, an individual; ZIXUAN WANG, an individual; MING LIU, an individual; HAOWEN LUO, an individual; YANZHAO YANG, an individual; LINGFENG XIAO, an individual; YAN LIU, an individual; CUI YU, an individual; QUN WEN, an individual; JIAXIN YE, an individual; RUI WANG, an individual; SHAOMEI MO, an individual; SHUHAN

Case No. 2:19-cv-00229-JCM-(PAL)

**STIPULATION AND ORDER TO STAY
DISCOVERY AND CONTINUE ALL
DEADLINES INCLUDING RULE 26(F)
CONFERENCE AND DEADLINE TO
SUBMIT STIPULATED DISCOVERY
PLAN AND SCHEDULING ORDER**

(FIRST REQUEST)

1 LIN, an individual; XIN ZHANG, an
2 individual; and HANXIAO HE, an individual
3 (Collectively as "Individual EB-5 Investors")

4 Plaintiff,

5 vs.

6 ANDREW S. FONFA, an individual;
7 WILLIAM WEIDNER, an individual;
8 DAVID JACOBY, an individual; SAHARA
9 INVESTMENTS, LLC; LAS VEGAS
ECONOMIC IMPACT REGIONAL
CENTER, LLC; EASTERN
INVESTMENTS, LLC; BOFU, LLC;
WEIDNER MANAGEMENT, LLC, and
Does 1 through 100, inclusive;

10 Defendants.

11
12 Pursuant to Rules 16(b) and 26(f) of the Federal Rules of Civil Procedure and Local Rules
13 LR 6-1 and 26-1, the undersigned parties hereby stipulate and agree to continue the Rule 26(f)
14 Conference and the submission of the Stipulated Discovery Plan and Scheduling Order as set forth
15 more fully below.

16 1. On March 4, 2020, counsel for Plaintiffs circulated an email scheduling the Rule
17 26(f) conference for March 19, 2020.

18 2. On March 5, 2020, counsel for Defendants circulated an email requesting Plaintiffs
19 to agree to a stay of this matter, including a stay of all discovery, based on the pending Motions to
20 Dismiss that, among other things, raise jurisdictional issues. (ECF 54 & 55).

21 3. On March 19, 2020, the parties participated in a telephonic Rule 26(f) conference,
22 and a "meet and confer" concerning Defendants' intention to move for a stay pending resolution
23 of the Motions to Dismiss.

24 4. During the March 19, 2020 telephonic conference, Defendants indicated they
25 would be filing a Motion to Stay absent an agreement by all parties to stay discovery. Plaintiffs
26 initially stated they would not agree to stay all discovery in this case pending a decision on the
27 Motions to Dismiss. The parties also discussed a temporary stay in this case, based on the pending

1 Motions to Dismiss, the burdens and costs of discovery and the pending Covid-19 outbreak.

2 5. Based on the agreement of counsel and the Motion to Stay filed by Defendants
3 (ECF 67), the parties hereby stipulate and agree that discovery in this matter, including Initial
4 Disclosures and any supplemental Rule 26(f) conference, is stayed and shall be continued 60 days
5 from the filing of this stipulation.

6 6. Subject to further agreement of the Parties or a motion by any of the Parties
7 extending the 60-day stay, the stay shall be lifted at the end of 60 days without any further action
8 or court order.

9 7. The Stipulated Discovery Plan and Scheduling Order shall be due within 14 days
10 after the stay is lifted.

11 8. If the Court has not yet ruled on the Motion for a Stay (ECF No. 67) within 60 days
12 of Court approval of this Stipulation, all of the parties reserve their respective rights to seek or
13 oppose a further and additional stay.

14 IT IS SO AGREED AND STIPULATED

15 Dated this 27th day of March, 2020

16 HOWARD & HOWARD ATTORNEYS PLLC

17 By: /s/ Robert Hernquist

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23 *Attorneys for Defendants Andrew Fonfa,
24 Sahara Investments LLC, Las Vegas Economic
25 Impact Regional Center, LLC and Eastern
26 Investments LLC*

17 Dated this 27th day of March, 2020

18 LEX NOVA LAW
19 EIZEN/GOLDSTEIN/RODERICK/SKINNER/
20 SPIRGEL/DRESSEL
21 LIMITED LIABILITY COMPANY

22 By: /s/ Darren Goldstein

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32 *Attorneys for Defendants William Weidner,
33 Bofu, LLC, Weidner Management, LLC, and
34 David Jacoby*

1 Dated this 27th day of March, 2020

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9 *Attorneys for Plaintiffs*

10
11
12 **IT IS SO ORDERED**

13 
14 **UNITED STATES MAGISTRATE JUDGE**
15 **DATED** 3/30/2020